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ACTION

DIST	LTR	ENC
BERARDINI, J. H.	X	X
BOGNAR, E. S.	X	X
CROCKETT, G. A.		
DECK, C. A.		
DEGENHART, K. B.		
DIETER, T. J.		
DIETERLE, S. E.	X	X
FERRERA, D. W.	X	X
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NORTH, K.		
PARKER, A. M.		
POWERS, K. P.		
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.		
TRICE, K. D.		
TIOR, N. R.		
WILLIAMS, J. L.		
BUTLER, L.	X	X

COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee  
Corres Control RFP5/28/03  
Date By

Ref Ltr #

DOE ORDER #

5400 /

Bill Owens, Governor  
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Located in Glendale, ColoradoLaboratory and Radiation Services Division  
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(303) 692-3090<http://www.cdphe.state.co.us>Colorado Department  
of Public Health  
and Environment

May 23, 2003

Richard J. DiSalvo  
Acting Assistant Manager for Environment and Stewardship  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200RE: Approval, Final Industrial Area Sampling and Analysis Plan Addendum #IA-03-04,  
IHSS Group 700-3 (B776-777), dated May 2003

Dear Mr. DiSalvo

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document and responses to the Division's comments. The addendum is hereby approved.

Comments on the draft addendum, dated March 2003, were discussed with facility representatives on April 17. A copy of your prime contractor's May 8 responses to our initial comments is attached for reference.

The revised document, however, resulted in a few lingering concerns. These were transmitted via e-mail to the contractor on May 19 and sufficiently addressed in a response on May 22. The final version of the document may now be transmitted to complete the approval cycle.

If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

Attachment

cc Norma Castaneda, DOE  
Tim Rehder, EPA  
Lane Butler, KHI  
Dave Shelton, KHI  
Mark Sattelberg, U.S. F&W  
Administrative Records Building T130GDOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE  
CEX-105-01

ADMIN RECORD

IA-A-001427

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Response to Colorado Department of Public Health and Environment  
Hazardous Materials & Waste Management Division  
Comments on  
Draft Industrial Area Sampling and Analysis Plan  
Addendum #IA-03-04 (700-3 Area)  
March 2003

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**General Comments:**

- 1 The Division reserves the opportunity for additional comments based on clarifications provided in response to the specific comments. Plan adequacy for some units cannot be fully considered at this time.
- 2 The potential for auger refusal and the point at which sampling should begin must be solved before work is initiated.

*Sampling problems at buildings will be discussed with the regulatory agencies to reach agreement on a path forward. This has been working at the other UBC characterizations.*

**Specific Comments:**

- 3 **Table 1** – For each unit shown in the table, one or more figures must show the Building number to which the location of the unit is referenced. For example, IHSS 150 4 is a "Radioactive Site Northwest of Building 750. However, IHSS 150 4 is not labeled on Figure 4, may be incorrectly labeled IHSS 150 7, but may also be incorrectly located per Figure 1 and per Figure 1 of the "Characterization Data Summary, IHSS Group 700-3", dated February 2003. Having Building 750 identified would have assisted the Division in determining the proper location of IHSS 150 4 and whether subsequent comments were necessary.

*The Tables and Figures will be labeled.*

- 4 **Section 2.0** - Figures 2 and 3 of the current document are principally limited to analytical results centered on IHSS 118 1. Thus, the background and MDL exceedances for UBC 776 and 777 from the "Characterization Data Summary, IHSS Group 700-3", dated February 2003, should be included as a new figure. Since the Characterization Data Summary preceded the Addendum better coordination of efforts is suggested to ensure that sampling plans reflect, and benefit from, all available data.

*A figure showing sampling locations and results greater than background means plus two standard deviations or method detection limits from the 700-3 Characterization Data Summary Report will be included.*

- 5 **Figure 1** - The three tanks of PAC 121 are not depicted, please add to the figure. The tanks are also not identified on subsequently figures.

*Tanks will be added to the Figures.*

- 6 **Section 3.0, 1<sup>st</sup> Bullet** – With the exception of three sites adjacent to UBC 701, no FY02 data are provided or referenced in the report. Please see Comment No. 4. Additionally, auger refusal for the UBC 776 and 777 sites ("Characterization Data Summary, IHSS Group 700-3", dated February 2003) raises questions on the validity of concluding that "contaminant concentrations were below RFCA Action Levels". The February 2003 report also compared results to Tier I and II Action Levels with arsenic or 1,1 DCE in exceedance at three of five partially sampled locations. These factors do not provide a convincing basis for a 22-meter statistical sampling grid, as the approved IASAP requires, since the biased sampling was not overly successful.

*The use of the 22-meter grid was approved by CDPHE. Additional biased samples will be collected as necessary. Additionally, when in the building, the opportunity to collect additional samples offset from the original under building characterization effort will be considered, based on actual conditions.*

- 7 2<sup>nd</sup> Bullet - Since the "Characterization Data Summary, IHSS Group 700-3", dated February 2003, specifically Table 6, show sampling deviations resulting in a reduced number of samples relative to the sampling plan and auger refusal, a 90% confidence level is questionable. Please verify that 90% was actually achieved.

*This comment will be addressed in the IHSS Group 700-3 Characterization Data Summary Report*

- 8 3<sup>rd</sup> Bullet - It is unclear how ">90% will be maintained with the currently suggested grid-spacing of 72 feet". Rather than assume that the referenced statistical models will ultimately corroborate a "better than 90% confidence" it would be appropriate to use such statistical demonstration as the basis for deviating, if possible, from the IASAP 11-meter grid. Please address.

*Confidence levels will be addressed in the IASAP Modification*

- 9 2<sup>nd</sup> Paragraph, (page 8) - Figure 2 and 3 are said to show adequate sample coverage for IHSSs 144(S) and 150 4. The statement is in error because the two IHSSs, and relevant sampling sites, are not depicted on the figures or in the addendum. Analytical results are also not provided. Rather than correct the omissions, simply reference the findings, and then fully document the locations, results and QA/QC data in a future NFAA document.

*IHSSs 144(S) and 150 4 will be addressed in the NFAA*

- 10 3<sup>rd</sup> Paragraph, (page 8) - The depth of sampling may also change, including deeper sampling. Please acknowledge.

*This is acknowledged in the IASAP and addendum*

- 11 General Comment: Please reference and agree to perform quality control/assurance sampling and evaluation as specified in the IASAP.

*IASAP QA procedures are followed. No text edits are required.*

- 12 Figure 4 - Please label PAC 1100 and 1116. IHSS 150 4 is either miss-labeled or unlabeled, please verify and correct. IHSS 150 7 is labeled on what is actually IHSS 118 2. Please correct.

*Figure 4 will be relabeled to include IHSSs, PACs, and UBC sites.*

- 13 Please exclude from the figure (i.e., turn off the color) the IHSSs, PACs and UBCs that are not part of IHSS Group 700-3. This will allow exclusive focus on sampling plans for the 700-3 units.

*The IHSSs, PACs, and UBCs that are not part of IHSS Group 700-3 will be colored differently from the sites of interest.*

- 14 Since PAC 121's location(s) is not shown, the Division is unable to judge whether biased samples suggested in Table 2 are defined or potentially adequate to characterize the nature and extent of contamination.

*IHSS 121 is OPWL and it is shown as a line, not a shape. The Addendum addressed the OPWL within the IHSS Group. No edits to the text are required.*

- 15 Table 3 - Please define Depth Interval "0-0.5" in this setting, i.e., the top of native soil or top of construction fill. If construction fill is to be excluded, please explain and justify the rationale. The Division believes that "0" includes UBC construction fill since contamination may reside within such material followed by native soils (subsurface soil in this context) where contaminants may have accumulated.

*Construction fill is not included in the 0.0 to 0.5 feet. This interval is native soil.*

16. Because information from the "Characterization Data Summary, IHSS Group 700-3", dated February 2003 has not been included in this addendum, the deviations due principally to auger refusal have not been considered. If a depth of 2.5 feet is necessary to properly characterize Building 776/777 UBC, then the addendum needs to address how previous auger refusal will be overcome in the new effort. (Auger refusal does not constitute relief unless it can be shown that such refusal is equivalent to an impermeable barrier to contaminant migration, including organic compounds. In any event, a portion if not all of the 0.5-2.5 foot sample needs to be collected unlike CF45-000 and CF45-001 where none of the 0.5-2.5 sample increment was collected due to auger refusal.)

*See previous response to General Comments and Comment 6*

17. As some units, e.g. IHSS 131 and PAC 121 (OPWL Leaks), etc., are planned to a depth up to 8.5 feet, the potential for auger refusal should be addressed before work begins.

*See previous response to General Comments*

18. For consistency, please change (or add) PAC 121 where "OPWL Leaks" are shown in the Site column.

*IHSS 121 will be added to Table 3*